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## BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
WILLIAM A. MUNDELL  
COMMISSIONER

DOCKET NO. T-03051A-96-0443  
DOCKET NO. T-03245A-96-0448  
DOCKET NO. T-01051B-96-0448  
DOCKET NO. T-02428A-96-0417  
DOCKET NO. T-01051B-96-0417  
DOCKET NO. T-02732A-96-0362  
DOCKET NO. T-01051B-96-0362  
DOCKET NO. T-03016A-96-0402  
DOCKET NO. T-01051B-96-0402  
DOCKET NO. T-03175A-96-0479  
DOCKET NO. T-01051B-96-0479  
DOCKET NO. T-03009A-96-0478  
DOCKET NO. T-01051B-96-0478  
DOCKET NO. T-02432A-96-0505  
DOCKET NO. T-01051B-96-0505  
DOCKET NO. T-03155A-96-0527  
DOCKET NO. T-01051B-96-0527  
DOCKET NO. T-03242A-97-0017  
DOCKET NO. T-01051B-97-0017

## 1996 CONSOLIDATED COST DOCKET

IN THE MATTER OF THE PETITION OF  
AMERICAN COMMUNICATIONS  
SERVICES, INC. AND AMERICAN COM-  
MUNICATIONS SERVICES OF PIMA  
COUNTY, INC. FOR ARBITRATION WITH  
US WEST COMMUNICATIONS, INC. OF  
INTERCONNECTION RATES, TERMS,  
AND CONDITIONS PURSUANT TO 47  
U.S.C. § 252(B) OF THE TELECOMMUNI-  
CATIONS ACT OF 1996.

COX ARIZONA TELCOM, L.L.C.'S COMMENTS  
ON COMMISSION STAFF'S MOTION TO  
REOPEN DOCKET OR TO OPEN A NEW DOCKET

Cox Arizona Telcom, L.L.C. ("Cox") submits the following comments on the Arizona Corporation Commission Staff's motion to reopen the consolidated interconnection cost and pricing dockets (Docket Nos. U-3021-96-448, *et al.*):

1. Cox supports Staff's motion. Cox believes that Decision No. 60635, which adopted unbundled network element prices and wholesale discount rates, should be re-examined to determine its impact on competition.

2. Cox also agrees that parties to the docket – and all other interested parties – be allowed to raise issues that need to be addressed in the reopened docket. That will allow a more accurate understanding of how the reopened docket should proceed.

3. Cox urges that the process begin sooner rather than later. Although there are other dockets that may have some impact on interconnection cost and pricing issues - such as the US WEST/Qwest merger, US WEST's sale of rural exchanges to Citizens and the Ninth Circuit appeal on Decision No. 60635 - the bottom line is that there are critical requirements of the Telecommunications Act of 1996 and the FCC implementing regulations that are not being met.

February 8, 2000.

Respectfully submitted,

COX ARIZONA TELCOM, L.L.C.

By



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